

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

POLYSCIENCES, INC.,

Plaintiff/Counter-Defendant,

v.

JOSEPH T. MASRUD,

Defendant/Counter-Plaintiff.

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Civil Action No. 2:20-cv-03649-PBT

**MOTION OF DEFENDANT/COUNTER-PLAINTIFF JOSEPH T. MASRUD TO
COMPEL TRADE SECRET DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 26, 33, and 37, Defendant/Counter-Plaintiff, Joseph T. Masrud (“Masrud”), respectfully moves the Court for an order in the form attached hereto. The grounds for this motion are set forth in the accompanying memorandum of law, which is incorporated herein by reference.

Respectfully submitted,

Dated: November 24, 2020

HOMANS PECK LLC

/s/ Julianne L. Peck

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Attorney for Defendant/Counter-Plaintiff

Joseph T. Masrud